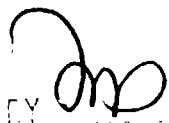


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FT. LAUDERDALE DIVISION

CASE NO.: 00-6016-CIV-UNGARO-BENAGES
MAGISTRATE JUDGE BROWN

FILED BY 
00 MAR 22 AM 10:51
CLARENCE E. ROOK
CLERK U.S. DIST. CT.
S.D. OF FLA - MIA

SAINTIL SAINTILUS

Plaintiff

v.

NAMASCO CORPORATION
and NAMASCO CORPORATION
d/b/a NAMASCO STEEL COMPANY

Defendant.

JOINT SCHEDULING REPORT

The Parties, pursuant to Local Rule 16.1(b)(7) and the Court's Order dated January 31, 2000, submit their Scheduling Report and state as follows:

1. Plain Statement of the Nature of the Claims

Plaintiff, Saintil Saintilus, claims that Namasco Corporation ("Namasco"), subjected him to discrimination in the workplace and terminated him because he is Haitian. Namasco denies Plaintiff's allegations in their entirety.

2. Summary of the Facts That are Uncontested

Plaintiff was terminated on July 15, 1998.

The EEOC issued a Right to Sue on September 20, 1999.

3. Summary of the Issues Presently Known

a. Whether Plaintiff was subjected to discrimination because he is Haitian.



- b. Whether Plaintiff was terminated because he is Haitian.
- c. If Plaintiff was discriminated against, whether Plaintiff is entitled to damages.
- d. If Plaintiff was discriminated against, whether Plaintiff is entitled to punitive damages.

4. Limitations on Discovery

Discovery should not be conducted in phases or limited to particular issues.

5. Detailed Schedule of Discovery

The parties intend to propound Interrogatories, Requests for Production and Requests for Admissions and agree to the limitations established by the Local Rules. The parties believe that discovery can be completed by October 1, 2000.

6. Proposed Limits on the Time:

- i. to join other parties and to amend the pleadings;
July 1, 2000
- ii. to file and hear motions; and
November 1, 2000
- iii. to complete discovery.
October 1, 2000

7. Requested Dates for Pre-trial Conference and Trial

The parties suggest that a Final Pretrial Conference be held on or about January 15, 2001. The parties request that the case be set for trial in February, 2001.

8. Estimate of Time Required for Trial

It is estimated that this action shall take 3-5 days to try. This is a jury trial.

9. List of Pending Motions

None.

10. Unique Legal or Factual Aspects of this Case

None.

11. Potential Need for References to Special Master or Magistrate

The parties agree to allow the Magistrate to rule on any discovery disputes subject to this Court's review. The parties do not agree to non-discovery hearings or a trial by the U.S. Magistrate Judge.

12. Estimate of Time Required for Trial

It is estimated that this action shall take 3-5 days to try. This is a jury trial.

13. Discussion of the Likelihood of Settlement

The parties agree to pursue settlement of this action as discovery proceeds. Settlement remains a possibility. The parties will attend mediation within the time required by the Court's Order.

14. Discussion of the Likelihood of Appearance in the Action of Additional Parties

There is limited likelihood of bringing additional parties to this lawsuit.

15. Proposals for the Formulation and Simplification of Issues

All issues appear to have been formulated and simplified at this time. The Parties will continue to cooperate in an effort to simplify the issues.

16. Admissions of Fact and Stipulations Regarding Authenticity

The parties are confident that they will be able to concur on several issues of fact and law, and enter into stipulations regarding tangible evidence which will avoid the

necessity of certain proof and serve to expedite the presentation of evidence and simplify the trial of this cause.

17. *Suggestions for Avoiding Unnecessary Proof and Cumulative Evidence*

The parties will work together to prevent unnecessary proof or cumulative evidence in the trial of this cause.

18. *Assignment of Case to a Particular Track*

Pursuant to S.D. Fla. L.R. 16.1.A.2, the parties believe this case should be assigned to the "Standard Track" given the complexity of the case, the number of witnesses, and the time estimated for discovery.

19. *Exhibit Lists*

Plaintiff's Exhibit List is attached as Exhibit A. Defendant's Exhibit List is attached as Exhibit B.

20. *Witness Lists*

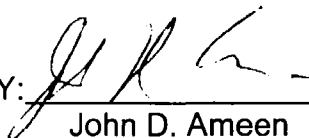
Plaintiff's Witness List is attached as Exhibit C. Defendant's Exhibit List is attached as Exhibit D.

21. *Other Items*

None.

DATED this 17 day of March, 2000.

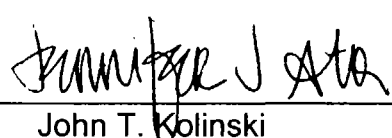
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BY: 

John D. Ameen
Florida Bar No. 0008036

DATED this 7 day of March, 2000.

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Florida Bar No. 0120911

**SAINTIL SAINTILUS vs. NAMASCO COPORATION
ANDNAMASCO CORPORATION
d/b/a NAMASCO STEEL COMPANY
CASE NO.: 00-6016-CIV-UNGARO-BENAGES
EXHIBIT A – PLAINTIFF'S EXHIBIT LIST**

- a. Saintil Saintilus' Charge of Discrimination
- b. Saintil Saintilus' Notice of Right to Sue.
- c. July 15, 1998 – Klockner/Namasco Termination of Employment Notice for Saintilus [NAMASCOSAINTILS003]
- d. Saintil Saintilus' Personnel file [NAMASCOSAINTILS 001-310].
- e. Pompano Beach Police Department file [NAMASCO/SAINTILUS POMPANO BEACH POLICE 001-007].
- f. All documents obtained through discovery in this case either by Plaintiff or Defendant.
- g. All interrogatories and answers thereto and requests to produce and answers thereto taken in this case.
- h. All documents discovered prior to trial, upon reasonable notice to opposing counsel.
- i. Rebuttal Exhibits.

**SAINTIL SAINTILUS v. NAMASCO CORPORATION
AND NAMASCO CORPORATION
d/b/a NAMASCO STEEL COMPANY
CASE NO.: 00-6016-CIV- UNGARO-BENAGES
EXHIBIT B - DEFENDANT'S EXHIBIT LIST**

Saintilus' Charge of Discrimination.

Saintilus' Notice of Right to Sue.

Broward County Human Rights Division file [Broward County Human Rights/Saintilus001-012].

7/15/98 Klockner/Namasco Termination of Employment Notice for Saintilus [NAMASCOSAINTILS003]

12/5/96 Employee Warning Record Saintilus warning for fighting [NAMASCOSAINTILS 258].

Saintilus' Personnel file [NAMASCOSAINTILS 001-310].

Saintilus' Employee Handbook [NAMASCOSAINTILS 311-394].

Saintilus' Workers Compensation file [NAMASCOSAINTILS 395-448].

Pompano Beach Police Department file [NAMASCO/SAINTILUS POMPANO BEACH POLICE 001-007].

All documents obtained through discovery in this case either by Plaintiffs or Defendant.

All interrogatories and answers thereto and requests to produce and answers thereto taken in this case.

All documents discovered prior to trial, upon reasonable notice to opposing counsel.

Rebuttal Exhibits.

By inclusion of any of Plaintiff's exhibit herein, Defendant does not waive its objections to admissibility, authenticity, relevance, or any other grounds of any of the documents which may be listed by Plaintiff.

Defendant reserves the right to amend and supplement this Exhibit List upon discovery of additional documents relevant to this case.

**SAINTIL SAINTILUS vs. NAMASCO COPORATION
ANDNAMASCO CORPORATION
d/b/a NAMASCO STEEL COMPANY
CASE NO.: 00-6016-CIV-UNGARO-BENAGES
EXHIBIT C – PLAINTIFF’S WITNESS LIST**

- a. Officer A. Cenno
Pompano Beach Police Department
100 SW 3rd Street
Pompano Beach, Florida 33060
- b. Detective M. Copley
Broward Sheriff's Office
District X1
100 SW 3rd Street
Pompano Beach, Florida 33060
- c. Steven Davis
Branch Manager
Namasco Corporation
1621 NW 12th Avenue
Pompano Beach, Florida
- d. Jairo Gonzalez
5614 Taylor Street
Hollywood, Florida 33062
- e. Lactaine Jean
Plaintiff's son-in-law
c/o Namasco Corporation
1621 NW 12th Avenue
Pompano Beach, Florida
- f. Officer K. Justice
Pompano Beach Police Department
100 SW 3rd Street
Pompano Beach, Florida 33060
- g. John H. Lewis
c/o Namasco Corporatoin
1621 NW 12th Avenue
Pompano Beach, Florida
- h. Papo Rodriguez
c/o Namasco Corporation
1621 NW 12th Avenue
Pompano Beach, Florida

- i. Saintil Saintilus
113 NE 5st Street, Apt. 8
Pompano Beach, Florida 33060
- j. Carlos Burgos
631 NE 23rd Street
Pompano Beach, Florida 33064

**SAINTIL SAINTILUS v. NAMASCO CORPORATION
AND NAMASCO CORPORATION
d/b/a NAMASCO STEEL COMPANY
CASE NO.: 00-6016-CIV- UNGARO-BENAGES
EXHIBIT D - DEFENDANT'S WITNESS LIST**

Officer A. Cenno
Pompano Beach Police Dept.
100 S.W. 3rd Street
Pompano Beach, FL 33060

Detective M. Copley
Broward Sheriff's Office
District X1
100 S.W. 3 Street
Pompano Beach, FL 33060

Steven Davis
Branch Manager
Namasco Corporation
1621 N.W. 12th Avenue
Pompano Beach, FL

Jairo Gonzalez
5614 Taylor Street
Hollywood, FL 33062

Lactaine Jean
Plaintiff's son-in-law
c/o Namasco Corporation
1621 N.W. 12th Avenue
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1621 N.W. 12th Avenue
Pompano Beach, FL

Papo Rodriguez
c/o Namasco Corporation
1621 N.W. 12th Avenue
Pompano Beach

Saintil Saintilus

Vincent Saintilus
Plaintiff's nephew
c/o Namasco Corporation
1621 N.W. 12th Avenue
Pompano Beach, FL

Carlos Burgos
631 N.E. 23rd Street
Pompano Beach, FL 33064

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